



November 11, 2019

VIA E-MAIL

Email: [REDACTED]

Re:	<u>Response to Public Records Act Request obo Inner City Education Foundation Public Schools ("ICEF").</u>
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Dear [REDACTED]

I am writing to respond to your Public Records Act requests submitted to our client, Inner City Education Foundation Public Schools ("ICEF") pursuant to Cal. *Govt. Code* §6250 *et seq.* on or about August 23, 2019.

As stated in our August 28, 2019 correspondence, ICEF reserved the right to charge for the full cost to compile records, extract information from an electronic record or undertake programming to satisfy the request. Cal. *Govt. Code* section 6253.9(b)(2).

To date, approximately 36 hours have been spent retrieving a portion of the emails you requested. Your request is likely to generate thousands of responsive records. Our client's IT vendor has been tasked to search for and produce these records. The records required to respond to your Public Records Act request necessitates ICEF to search for, collect, and appropriately examine a voluminous amount of separate and distinct records that are demanded in a single request, as well as compile data or construct a computer report to extract data that is responsive to your request.

ICEF has only partially completed its analysis of the cost required to compile the requested records. The IT department, at a rate of \$20/hour, has expended 36 hours to date to compile a portion of the requested data. A data analyst, also at the rate of \$20/hour, must review the compiled data to ensure any and all confidential information, including student names protected under Federal Educational Rights and Privacy Act ("FERPA"), is redacted. It is estimated an additional 50 hours will be required for the IT vendor to retrieve the remaining information requested. As well, it is estimated that approximately 100 hours will be required for the data analyst to review the compiled data to ensure FERPA compliance. Hundreds, if not thousands of emails will need to be reviewed individually to determine if any student personally identifying information is contained there. Thus, hundreds, if not thousands of student names or other personally identifying information may need to be redacted pursuant to the requirements of FERPA.

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Please remit payment in the amount of \$3,720.00 which will enable ICEF to complete the work requested immediately.

Given the voluminous nature of the responsive records, we will require an additional minimum forty-five (45) days to review the records to determine if any records are exempt from disclosure. Sincerest apologies for the delay, however, regrettably the additional time is necessitated by the voluminous nature of your request as well the time to review the responsive material. The minimum of forty-five days falls during ICEF's holiday break and, as such ICEF estimates it will be able to fulfill the request by January 10, 2019.

If you have any questions or need any additional information, please do not hesitate to let us know.

Sincerely,
HANSBERGER & KLEIN
A Professional Law Corporation



Erica B. Klein

CC
Parker Hudnut, Chief Executive Officer
Inner City Education Foundation Public Schools